# IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

A.G., a minor child; D.A., a minor child; A.L., a minor child; M.K., a minor child;	
and M.H., a minor child;	)
PLAINTIFFS,	) ) CASE NO: 2:05-CV-1090-MEF
VS.	)
	)
AUTAUGA COUNTY BOARD OF	)
EDUCATION, et al.,	)
DEFENDANTS.	) )
B.H., a minor child, by and through his	)
mother and next of friend, D.S.,	)
	)
PLAINTIFFS,	)
	)
VS.	) CASE NO: 2:06-CV-0393-MEF
AUTANCA COUNTY DO ADD OF	)
AUTAUGA COUNTY BOARD OF	<i>)</i>
EDUCATION, et al.,	)
DEFENDANTS.	) ) )

# AUTAUGA COUNTY BOARD OF EDUCATION, JOSEPH L. BUTLER AND DENE CLEVELAND'S WITNESS LIST

COME NOW Defendants Autauga County Board of Education, Joseph L. Butler and Dene Cleveland and pursuant to this Court's pretrial scheduling Order, and submits this, their witness list, for trial:

## I. At trial, the defendants currently plan to call the following witnesses:

1. Defendant Joseph L. Butler, employee of Autauga County Board of Education, c/o Autauga County Board of Education, 153 West 4<sup>th</sup> Street, Prattville, Alabama 36067, (334)365-5706;

- 2. Defendant Dene Cleveland, employee of Autauga County Board of Education, c/o Autauga County Board of Education, 153 West 4<sup>th</sup> Street, Prattville, Alabama 36067, (334)365-5706;
- 3. Janie Crawford, c/o Autauga County Board of Education, 153 West 4<sup>th</sup> Street, Prattville, Alabama 36067, (334)365-5706;
- 4. Records custodian from the Autauga County Board of Education, c/o Autauga County Board of Education, 153 West 4<sup>th</sup> Street, Prattville, Alabama 36067, (334)365-5706

### II. At trial, the defendants may call the following witnesses:

- 1. Gloria Goodson, c/o Autauga County Board of Education, 153 West 4<sup>th</sup> Street, Prattville, Alabama 36067, (334)365-5706;
- 2. Bobby Zeigler, c/o Autauga County Board of Education, 153 West 4<sup>th</sup> Street, Prattville, Alabama 36067, (334)365-5706;
- 3. Officer James Harry, c/o Prattville Police Department, 101 West Main Street, Prattville, Alabama 36067, (334) 361-3671;
- 4. Lieutenant Daryl Mangrum, c/o Prattville Police Department, 101 West Main Street, Prattville, Alabama 36067, (334) 361-3671;
- 5. Angel Garrett, c/o Autauga County Board of Education, 153 West 4<sup>th</sup> Street,

Prattville, Alabama 36067, (334)365-5706;

- 6. Debbie May, c/o Autauga County Board of Education, 153 West 4<sup>th</sup> Street, Prattville, Alabama 36067, (334)365-5706;
- 7. Jim Abraham, c/o Autauga County Board of Education, 153 West 4<sup>th</sup> Street, Prattville, Alabama 36067, (334)365-5706;
- 8. Nancy Jackson, c/o Autauga County Board of Education, 153 West 4<sup>th</sup> Street, Prattville, Alabama 36067, (334)365-5706;
- 9. Roger Stifflemire, c/o Autauga County Board of Education, 153 West 4<sup>th</sup> Street, Prattville, Alabama 36067, (334)365-5706
- 10. Lee Hicks, c/o Autauga County Board of Education, 153 West 4<sup>th</sup> Street, Prattville, Alabama 36067, (334)365-5706;
- 11. Sandra Northington, c/o Autauga County Board of Education, 153 West 4<sup>th</sup> Street, Prattville, Alabama 36067, (334)365-5706;
- 12. Amy Boyd, c/o Autauga County Board of Education, 153 West 4<sup>th</sup> Street, Prattville, Alabama 36067, (334)365-5706;
- 13. Theresa Calhoun, c/o Autauga County Board of Education, 153 West 4<sup>th</sup> Street, Prattville, Alabama 36067, (334)365-5706;
- 14. Norm Kleinschmidt, c/o Autauga County Board of Education, 153 West 4<sup>th</sup> Street, Prattville, Alabama 36067, (334)365-5706;
- 15. Demecia Austin, 626 Sawmill Quarters Road, Prattville, Alabama, 36067, (334) 358-0705;

16. Prattville Intermediate School students who can testify as to actions taken by Colonel Wright

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on October 20, 2004 at Prattville Intermediate School, but whose identities cannot be disclosed

because of federal privacy laws, including FERPA; and

Any member of the Autauga County Board of Education, 153 West 4th Street, Prattville, 17.

Alabama 36067, (334) 365-5706.

Any other witnesses needed for rebuttal, impeachment, authentication, corroboration,

and/or to address issues previously not raised in this case, but raised by plaintiffs or any other

defendant at trial, in accordance with the Court's rulings, Pretrial Order, the Federal Rules

of Civil Procedure and Federal Rules of Evidence

By disclosing the witnesses above, the defendants do not agree or stipulate that any

or all of the testimony of any such witness or any deposition the witness may have given (in

its entirety) is admissible and reserves its right to object as allowed by the Court's pretrial

Order, the Federal Rules of Evidence and the Federal Rules of Civil Procedure. Though the

defendants do not anticipate any other witnesses, as their right, the defendants reserve the

right to call any witnesses listed or called by any other party to which the defendants do not

object or witnesses for rebuttal, impeachment, corroboration or authentication of evidence

or testimony, and in addition, for any unanticipated general or specific issue which may arise

at trial concerning any aspect of the allegations.

Respectfully submitted,

s/Katherine C. Hortberg

Mark S. Boardman (ASB-8572-B65M)

E-mail: mboardman@boardmancarr.com

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Katherine C. Hortberg (ASB-5374-B34K) E-mail: <u>khortberg@boardmancarr.com</u> BOARDMAN, CARR & HUTCHESON, P.C. 400 Boardman Drive Chelsea, Alabama 35043-8211

Telephone: (205) 678-8000 Facsimile: (205) 678-0000

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have on this 25th day of April, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Michael J. Crow, Esq. BEASLEY, ALLEN, CROW, METHVIN, PORTIS & MILES, P.C. P. O. Box 4160 Montgomery, Alabama 36103-4160

Robert D. Drummond, Jr., Esq. 323 De La Mare Avenue Fairhope, Alabama 36532

Mr. Terry C. Wright, AIS 247561 Limestone Correctional Facility, Dorm 16 28779 Nick Davis Road Harvest, AL 35749-7009

s/Katherine C. Hortberg OF COUNSEL